

DENNIS L. KENNEDY  
Nevada Bar No. 1462  
JOSEPH A. LIEBMAN  
Nevada Bar No. 10125  
JOSHUA P. GILMORE  
Nevada Bar No. 11576  
**BAILEY ♦ KENNEDY**  
8984 Spanish Ridge Avenue  
Las Vegas, Nevada 89148-1302  
Telephone: 702.562.8820  
Facsimile: 702.562.8821  
DKennedy@BaileyKennedy.com  
JLiebman@BaileyKennedy.com  
JGilmore@BaileyKennedy.com

*Attorneys for Defendants & Counterclaimant*  
RUSSELL J. SHAH, M.D.; DIPTI R. SHAH,  
M.D.; RUSSELL J. SHAH, MD, LTD.; DIPTI  
R. SHAH, MD, LTD.; and RADAR  
MEDICAL GROUP, LLP dba UNIVERSITY  
URGENT CARE

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ALLSTATE INSURANCE COMPANY,  
ALLSTATE PROPERTY & CASUALTY  
INSURANCE COMPANY, ALLSTATE  
INDEMNITY COMPANY, and ALLSTATE  
FIRE & CASUALTY INSURANCE  
COMPANY,

Plaintiffs,

vs.

RUSSELL J. SHAH, M.D.; DIPTI R. SHAH,  
M.D.; RUSSELL J. SHAH, MD, LTD.; DIPTI  
R. SHAH, MD, LTD.; and RADAR MEDICAL  
GROUP, LLP dba UNIVERSITY URGENT  
CARE, Does 1-100, and ROES 101-200,

Defendants.

AND RELATED CLAIMS.

Case No. 2:15-cv-01786-APG-CWH

**STIPULATION AND ORDER TO  
EXTEND DEADLINES**

**(First Request)**

1 Plaintiffs/Counterdefendants ALLSTATE INSURANCE COMPANY, ALLSTATE  
2 PROPERTY & CASUALTY INSURANCE COMPANY, ALLSTATE INDEMNITY COMPANY,  
3 and ALLSTATE FIRE & CASUALTY INSURANCE COMPANY (the “Allstate Parties”), and  
4 Defendants and Counterclaimant RUSSELL J. SHAH, M.D., DIPTI R. SHAH, M.D., RADAR  
5 MEDICAL GROUP, LLP dba UNIVERSITY URGENT CARE, RUSSELL J. SHAH, MD, LTD.,  
6 and DIPTI R. SHAH, MD, LTD. (the “Radar Parties”), by and through their respective attorneys of  
7 record, stipulate and agree as follows:

8 1. On May 12, 2017, the Radar Parties filed their Motion to Compel Addressing the  
9 Relevancy of Their Third Set of Requests for Production of Documents [ECF No. 146] (“Motion to  
10 Compel”).

11 2. Following an extension of time to respond [ECF No. 154], on June 2, 2017, the  
12 Allstate Parties filed their Response to the Motion to Compel [ECF No. 155].

13 3. The Radar Parties presently have until June 9, 2017 to file their Reply in Support of  
14 their Motion to Compel.

15 4. On May 26, 2017, the Allstate Parties filed their Motion to Dismiss Amended  
16 Counterclaims Pursuant to Fed. R. Civ. P. 12(b)(6) [ECF No. 153] (“Motion to Dismiss”).

17 5. The Radar Parties presently have until June 9, 2017 to file their Response to the  
18 Motion to Dismiss.

19 6. Due to unforeseen circumstances and scheduling conflicts for the Radar Parties’  
20 counsel, the Radar Parties shall now have up to and including June 16, 2017 to file their Response to  
21 the Motion to Dismiss and up to and including June 23, 2017 to file their Reply in Support of their  
22 Motion to Compel.

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

7. This is the first stipulation for an extension of time to file the Response to the Motion to Dismiss and Reply in Support of the Motion to Compel. This stipulation is made in good faith and not to delay the proceedings.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 8<sup>th</sup> day of June, 2017.

DATED this 8<sup>th</sup> day of June, 2017.

FAIN ANDERSON VANDERHOEF  
ROSENDAHL O'HALLORAN SPILLANE  
PLLC

BAILEY ♦ KENNEDY

By: /s/ Joshua P. Gilmore

By: /s/ Eron Z. Cannon  
ERON Z. CANNON  
701 Fifth Avenue, Suite 4750  
Seattle, WA 98104

DENNIS L. KENNEDY  
JOSEPH A. LIEBMAN  
JOSHUA P. GILMORE  
8984 Spanish Ridge Avenue  
Las Vegas, NV 89148

JARED P. GREEN  
TODD W. BAXTER  
McCORMICK, BARSTOW,  
SHEPPARD, WAYTE & CARRUTH  
LLP  
8337 West Sunset Road, Suite 350  
Las Vegas, NV 89113

*Attorneys for Defendants & Counterclaimant*

*Attorneys for Plaintiffs/Counterdefendants*

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

DATED: June 9, 2017